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March 11, 2021

VIA CM-ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Michael Hild, et al., No. 19-cr-602 (RA) – Request for 4-day extension to submit proposed voir dire questions and jury instructions

Dear Judge Abrams:

I am counsel for defendant Michael Hild in this matter. I write to request a 4-day extension to submit proposed voir dire questions and proposed jury instructions in relation to the trial of this matter currently scheduled for April 12, 2021. Pursuant to the terms of the interim schedule for the litigation previously proposed by the parties and adopted by the Court (pursuant to an Order of this Court dated August 25, 2020), proposed voir dire questions and jury instructions are to be submitted to the Court by March 11, 2021. The defense requests an extension of the deadline until Monday, March 14, 2021. The government does not oppose the defense's request. The purpose of the request is to allow the defense an opportunity to review the proposed voir dire questions and jury instructions to be submitted by the government before making its own submissions. Based on discussions with the government attorneys about these matters, I believe that it is likely that the proposed voir dire questions and proposed jury instructions submitted by the government will be acceptable to the defense (at least, in substantial respects). The brief extension requested by the defense is for the purpose of giving the defense an opportunity to evaluate the government's submissions, in the hope that the defense is likely to be agreeable to them (at least, in substantial part).

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It is respectfully submitted that the defense's requested 4-day extension is in the interest of justice, both parties, and the Court as well insofar as if the defense is comfortable with the government's submissions the Court can avoid spending precious judicial resources resolving disputes between the parties related to the proposed voir dire questions and jury instructions in connection with the trial of this matter.

Sincerely,

Benjamin G. Dusing

cc: All Counsel of Record

SO ORDERED:

Dated: New York, New York
March 11, 2021



RONNIE ABRAMS, U.S.D.J.